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STEPHAN HARRIS, CLERK
CHEYENNE

UNITED STATES DISTRICT COURT

for the

District of Wyoming

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER: 16-MJ-98-B

TRAVIS BENSON

I, Shannon L. Reinert, the complainant in this case, state the following is true to the best of my knowledge and belief.

On or about November 10, 2016, in the District of Wyoming, the Defendant, **TRAVIS BENSON**, did knowingly possess material which contains an image, or images, of child pornography, involving a prepubescent child, as defined in Title 18, United States Code, Section 2256(8)(A), that were produced using materials that had been shipped and traveled in and affected interstate commerce, to wit: the Defendant, **TRAVIS BENSON**, possessed an HGST 1TB hard drive, a product of China, that contained digital images of prepubescent children engaged in sexually explicit conduct

In violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2).

COUNT TWO ON NEXT PAGE

I further state that I am a Special Agent with U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), and I am assigned to the Wyoming Internet Crimes Against Children Task Force (ICAC) and at all times mentioned herein was acting in official capacity. This complaint is based on the following facts:

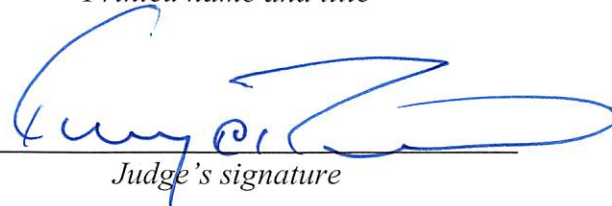
☒ Continued on the attached sheet.


Complainant's signature

Shannon L. Reinert, ICE, HSI
Printed name and title

Sworn to before me and signed in my presence.

Date: November 10, 2016


Judge's signature

City and state: Cheyenne, Wyoming

Hon. Kelly H. Rankin,
Chief Judge, United States Magistrate Judge
Printed name and title

COUNT TWO

From on or about October 1, 2016, through and including November 10, 2016, in the District of Wyoming, the Defendant, **TRAVIS BENSON**, knowingly transported child pornography, as defined by Title 18, United States Code, Section 2256(8), using a means and facility of interstate commerce, namely, the Defendant, using the Internet, uploaded an image of a child engaged in sexually explicit conduct to a remote storage location maintained by Dropbox, Inc.

In violation of 18 U.S.C. §§ 2252A(a)(1) and (b)(1).

**SWORN STATEMENT IN SUPPORT OF CRIMINAL
COMPLAINT**

UNITED STATES v. TRAVIS BENSON

I, Shannon L. Reinert, being duly sworn on oath, swear and affirm as follows:

1. Your Complainant is a Special Agent with U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), and has been since August of 2009. Your Affiant is currently assigned to the Cheyenne, Wyoming, HSI Office of the Resident Agent in Charge (RAC), where she is tasked with conducting a variety of investigations. Your Affiant is also assigned to the Wyoming Division of Criminal Investigation and works as a member of the Wyoming Internet Crimes Against Children (ICAC) Task Force. Your Affiant has received training in the investigation of matters involving the sexual exploitation of children to include the production, possession, receipt and transmission of child pornography, criminalized by Title 18, United States Code, § 2252A.

2. As a result of an investigation conducted by your Complainant, on November 7, 2016, I was able to develop sufficient facts and information to establish probable cause to obtain a federal search warrant for the premises located at 163 ½ N. Hodgeman Street, Laramie, Wyoming, wherein Travis Benson resides. Said search warrant authorized Your Complainant and other law enforcement personnel to seize evidence pertaining to the possession, receipt, distribution, and transportation of child pornography.

3. Your Complainant and other law enforcement personnel executed said search warrant on November 10, 2016, at said residence. During the course of said search warrant, Your

Complainant caused to be seized electronic storage media including, two ASUS laptop computers, smartphones, a tablet, and an external hard drive. Within one of the ASUS laptops, an HGST 1TB hard drive, a product of China was located. On this hard drive, agents discovered images of prepubescent children engaged in sexually explicit conduct. Specifically, one of the images located was a video titled, “! New ! (Pthc) 2007 8Yo Girl Jenny Sucks Dog Dick.mpg .” Said file is a 48 second video depicting a known child victim named “Jenny.” In this video, “Jenny” is approximately 8-10 years of age and performs oral sex on a dog. This image could not have been brought into existence without the operation of the aforesaid HGST 1TB hard drive.

4. Further examination of said computer and hard drive revealed that the computer was used to transfer files containing images of children engaged in sexually explicit conduct to the remote storage site Dropbox. I know based upon my training and experience that Dropbox is a file hosting service operated by Dropbox, Inc., headquartered in San Francisco, California, that offers cloud storage, file synchronization, and client software. Dropbox allows users to create a special folder on each of their computers, which Dropbox then synchronizes so that it appears to be the same folder (with the same contents) regardless of which computer is used to view it. Files placed in this folder also are accessible through a website and mobile phone applications. Dropbox provides client software for Windows, Mac OS X, Linux, Android, iOS, BlackBerry OS and web browsers. Dropbox allows users to upload files, photos, and favorites on servers, to cloud storage, and allows members to access them from any computer with an Internet connection. After uploading photos and/or files to Dropbox, the user can share the photos and files with anyone. The user can send an email, to other individuals inviting them to view the photos and files. The service allows the user to keep the files private, share with contacts, or make the files public. Based upon my training and experience, I know that Dropbox

servers are not located in the State of Wyoming, and that a transfer of a file from a computer in Wyoming would by necessity involve the file crossing a state line. The examination specifically revealed that sometime on or about October 1, 2016, a file titled, "(Pthc) St Petersburg (i08).avi." was sent via the Internet to a Dropbox account maintained by TRAVIS BENSON. Said file is a 5 minute 40 second video depicting a nude 12-14 year-old girl with a nude adult male laying on a bed. At approximately the 34 second mark, the girl is sitting on the headboard of a bed with her vagina exposed then she leans down and performs oral sex on the adult male.

5. On November 10, 2016, your Complainant interviewed TRAVIS BENSON. Benson admitted that images of child pornography would be found on his computer. He further admitted that he used the computer to transfer images of child pornography to a Dropbox account on or about October 1, 2016.

**END OF SWORN
STATEMENT**

PENALTY SUMMARY
- COMPLAINT

DEFENDANT NAME: TRAVIS BENSON

DATE: NOVEMBER 10, 2016

INTERPRETER NEEDED: ☐ Yes ☒ No

THE GOVERNMENT, PURSUANT TO RULE 18, F.R.Cr.P., WITH DUE REGARD FOR THE CONVENIENCE OF THE DEFENDANT, ANY VICTIM AND WITNESSES, AND THE PROMPT ADMINISTRATION OF JUSTICE, REQUESTS TRIAL BE HELD IN:

☐ Cheyenne ☐ Casper ☐ Lander ☒ No Preference

VICTIM: ☐ Yes ☐ No ☒ Unknown

COUNT ONE: 18 U.S.C. § 2252A(a)(5)(B) and (b)(2)
(Possession of Child Pornography)

PENALTY: NMT 20 YEARS IMPRISONMENT
\$250,000 FINE
5 YEARS – LIFE SUPERVISED RELEASE
\$100 SPECIAL ASSESSMENT
\$5000 SPECIAL ASSESSMENT

COUNT TWO: 18 U.S.C. § 2252A(a)(1) and (b)(1)
(Transportation of Child Pornography)

PENALTY: NLT 5 or NMT 20 YEARS IMPRISONMENT
\$250,000 FINE
5 YEARS – LIFE SUPERVISED RELEASE
\$100 SPECIAL ASSESSMENT
\$5000.00 SPECIAL ASSESSMENT

TOTALS: NLT 5 YEARS OR MORE THAN 40 YEARS IMPRISONMENT
\$500,000.00 FINE
5 YEARS TO LIFE SUPERVISED RELEASE
\$200.00 SPECIAL ASSESSMENT
\$10,000.00 SPECIAL ASSESSMENT

AGENT: Shannon Reinert / ICE
AUSA: Timothy J. Forwood

ESTIMATED TIME OF TRIAL: ☒ 1-5 days ☐ more than 5 days

THE GOVERNMENT WILL SEEK DETENTION IN THIS CASE:

 X Yes No

**The court should not grant bond because the
Defendant is not bondable because there are
detainers from other jurisdictions:**

 Yes ☐ No